

STATE OF INDIANA ) IN THE WHITE COUNTY SUPERIOR/CIRCUIT COURT  
COUNTY OF WHITE ) SS: 91D01-2304-CT-000015  
 ) CAUSE NO. \_\_\_\_\_

MIKIALA COLLAINS and LADENA LEWIS, )  
 )  
 Plaintiffs, )  
 )  
 v. )  
 ) JURY TRIAL REQUESTED  
INDIANA BEACH HOLDINGS LLC, )  
 )  
 Defendant. )

**COMPLAINT FOR DAMAGES AND REQUEST FOR JURY TRIAL**

Come now Plaintiffs, Mikiala Collains and LaDena Lewis, by counsel, and for their cause of action against the Defendant, Indiana Beach Holdings LLC, alleges and states as follows:

1. At all times relevant hereto, Plaintiff, Mikiala Collains, was a resident of the City of Indianapolis, County of Marion, State of Indiana.
2. At all times relevant hereto, Plaintiff, LaDena Lewis, was a resident of the City of Indianapolis, County of Marion, State of Indiana.
3. At all times relevant hereto, Defendant, Indiana Beach Holdings LLC, was a domestic company with its principal place of business located in the County of White, City of Monticello, State of Indiana.
4. At all times relevant hereto, Defendant, Indiana Beach Holdings LLC, owned and operated a theme park called Indiana Beach Amusement and Water Park Resort which is located at 5224 E. Indiana Beach Road, Monticello, Indiana 47960.
5. On or about June 20, 2021, the Plaintiffs, Mikiala Collains and LaDena Lewis, were theme park guests at Indiana Beach Amusement and Water Park Resort.

6. During a ride known as Rocky's Rapids Log Flume, the Plaintiffs were in a compartment that broke off of the ride track and flipped into a cement wall.

7. The Plaintiffs had to tip their seating compartment back onto the track in order to exit the ride.

8. The violent accident was caused by the negligence of Defendant, who failed to properly maintain the Rocky's Rapids Log Flume ride and mitigate the dangerous conditions that led to the ride derailing and injuring the Plaintiffs.

9. The Defendant is liable for damages to the Plaintiffs for their negligent actions which caused the accident described herein.

10. As a direct and proximate result of Defendant's negligence, Plaintiffs sustained personal injuries, some of which are permanent in nature. In order to treat their injuries and to lessen their pain and suffering, Plaintiffs engaged the services of hospitals, physicians, and radiologists for medical care and diagnostic testing.

11. As a direct and proximate result of the Defendant's negligence, Plaintiffs experienced deep mental anguish, emotional distress, and pain and suffering for their physical injuries, all of which may continue for an indefinite period.

12. As a result of the collision described herein and the injuries to the Plaintiffs resulting therefrom, Plaintiffs' quality of life has been diminished.

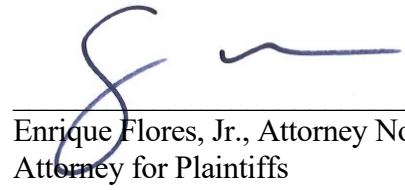
13. As a direct and proximate result of Defendant's negligence, Plaintiffs have been otherwise damaged.

WHEREFORE, Plaintiffs, Mikiala Collains and LaDena Lewis, pray for judgment in their favor and against Defendant, Indiana Beach Holdings LLC, in an amount commensurate with their

injuries and damages, for the cost of this action, for trial by jury, and for all other relief just and proper in the premises.

Respectfully Submitted,

FLORES LAW GROUP, LLC



Enrique Flores, Jr., Attorney No. 28855-49  
Attorney for Plaintiffs

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**REQUEST FOR JURY TRIAL**

Plaintiff, by counsel, respectfully requests that a jury try the above matter.

Respectfully Submitted,

FLORES LAW GROUP, LLC

  
Enrique Flores, Atty. No. 28855-49  
Attorney for Plaintiffs

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